



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



268764

REPLY TO THE ATTENTION OF
SR-6J

April 13, 2004

Terry Casey
Efficasey Environmental, LLC.
14015 Park Drive
Suite 109
Tomball, Texas 77375

Northern Ohio Lumber and Timber Company
(NOLTCO)
Bredt-Zanick, LLC
2850 W. Third Street
Cleveland, Ohio 44113

VIA TELEFAX AND FIRST CLASS U.S. MAIL

**Re: Acceptance of the Final Non Time Critical Removal Action Completion
Report at the Master Metal, Inc. Site, Cuyahoga County, Cleveland, Ohio
under Order No. VW-'02-C-711**

Dear Mr. Casey and NOLTCO:

The U.S. Environmental Protection Agency (U.S. EPA) Region 5 has completed its technical review of the Non Time Critical Removal Action Completion Report at the Master Metal, Inc. Site, Cuyahoga County, Cleveland, Ohio ("Report") for the Master Metals, Inc (MMI) site in Cleveland, Ohio under Order No. VW-'02-C-711. The Report was submitted by ENTACT on the behalf of National Lead (NL) pursuant to the U.S. EPA Administrative Order on Consent (AOC) and Statement of Work (SOW) for the Non Time Critical Removal actions at the Site. The draft Report of May 2003 was revised and resubmitted to U.S. EPA in September 2003. In addition, U.S. EPA notified NL in a letter to Mr. Casey dated August 6, 2003, that the Agency had approved the revised Operation and Maintenance Plan required by Section V, Paragraph 2.4 of the AOC, *Post-Removal Site Control/Operation and Maintenance*.

The Report was submitted pursuant to Section V, Paragraph 2.6 of the AOC, in which the respondents are required to submit a final report summarizing actions taken to comply with the AOC. U.S. EPA in consultation with Ohio EPA has determined that all requirements of Section V, Paragraph 2.6 for the final report have been met; hence this letter serves to document the Region's acceptance of the Report and the Respondent's accompanying certification pursuant to the AOC.

As you know, in accordance with the Work Plan schedule, Respondents submitted the proposal for post-removal site control consistent with 40 C. F. R. §300.415 (1), and OSWER Directive 9360.2-02. The Limited Respondents for Operation and Maintenance Only, Bredt-Zanick, LLC and NOLTCO are primarily responsible for completing the post-removal site control and

Operation and Maintenance (O&M) at the former MMI facility. These activities include but are not limited to:

- Routine inspection and repair as needed, to maintain the integrity of the asphalt and concrete covers;
- Routine inspection and maintenance of soil and vegetative cover, including the polyethylene barrier adjacent to the eastern exterior wall of the roundhouse; and
- Routine inspection and repair, as needed, of the 6-foot perimeter fence to ensure that access to the site is controlled.

Pursuant to Section V, Paragraph 8 (a) 1-3, *Institutional Controls*, of the AOC, the Limited Respondents for O&M Only agree to refrain from using the former MMI facility in any manner that would interfere with or adversely affect the integrity or protectiveness of the actions implemented.

In addition, Region 5 anticipates receiving from the Limited Respondents for O & M Only the annual inspection/progress reports which should include the information listed in Table 1.0 and 1.1 of Attachment II of the O&M Plan (June 2003), specifically, the asphalt and concrete cover inspection, documentation of the integrity of the soil cover around the exterior wall of the roundhouse, and perimeter fence maintenance.

U.S. EPA Region 5 appreciates the efforts of NL Industries through its contractor Efficasey Environmental, LLC, its consultants and contractors toward the timely completion of a significantly difficult removal action construction/reuse project.

If you have any questions regarding this letter, please do not hesitate to contact the Remedial Project Manager, Gwendolyn Massenburg, at (312) 886-0983.

Sincerely,



William J. Boren,
Acting Chief, Emergency Response Branch

cc:

Sheila Abraham, Ohio EPA
ENTACT & Associates, LLC
Dennis Reis, Dennis Reis, LLP
Marcus Martin, Highland Environmental Management